



California Regional Water Quality Control Board

Santa Ana Region



Winston H. Hickox
Secretary for
Environmental
Protection

Internet Address: <http://www.swrcb.ca.gov/rwqcb8>
3737 Main Street, Suite 500, Riverside, California 92501-3348
Phone (909) 782-4130 - FAX (909) 781-6288

Gray Davis
Governor

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our website at www.swrcb.ca.gov/rwqcb8.

February 13, 2003

Mr. Tad Trout
American Promotional Events, Inc. – West
555 North Gilbert Street
Fullerton, CA 92833-2508

CONDITIONAL APPROVAL OF THE WORK PLAN ADDENDUM FOR PERCHLORATE INVESTIGATION AT THE AMERICAN PROMOTIONAL EVENTS, INC. – WEST FACILITY – 3196 NORTH LOCUST AVENUE, RIALTO, SAN BERNARDINO COUNTY

Dear Mr. Trout:

On October 22, 2002, you submitted a work plan for a limited investigation of the soil at the American Promotional Events, Inc. – West facility (APE – West) in Rialto. The work plan was prepared by your consultant, PES Environmental (PES), and submitted in response to the requirements of the Investigation Order that I sent to you on September 25, 2002. On November 22, 2002, I sent you a response to your work plan that included Board staff's detailed comments on the work plan, and notified you that the proposed work plan was inadequate. My November 22, 2002 letter also stipulated that an addendum to the proposed work plan was to be submitted by December 12, 2002. On December 11, 2002, at your request, Board staff met with Messrs. Daniel Coyle, Steven Goldberg, Keith O'Brien and Carl Michelsen to discuss the required addendum to the APE – West work plan. During that meeting, we agreed to allow submittal of the work plan addendum by December 16, 2002.

Board staff has reviewed the December 16, 2002 submittal from PES entitled "Work Plan Addendum for Perchlorate Investigation for American Promotional Events – West, Inc., 3196 North Locust Avenue, Rialto, California." We believe that APE – West has responded to some of our concerns and technical comments regarding the proposed site investigation. Our specific comments regarding the APE – West work plan addendum are included in this letter. Members of the Inland Empire Perchlorate Regulatory Task Force also provided comments on the work plan addendum, and those technical comments have been considered in preparing this response. Based on our review, I conditionally approve the proposed work plan, as modified by the comments included in this letter.

The proposed fieldwork at the APE – West site consists of obtaining samples from exploratory borings at various locations at the facility. Exploratory borings are proposed outside of the four warehouse buildings (Buildings 76 through 79), near the loading docks and the exterior doors. The exact locations of the proposed boreholes are proposed to be determined in the field, in consultation with Board staff. Borings are proposed to be drilled to a maximum depth of 25 feet below ground surface (bgs). Soil samples are proposed to be collected at depths of 1, 5, 15, and 25 feet bgs. At three of the four large warehouse buildings (Buildings 76, 78 and 79), two borings are proposed to be completed at each building, with four soil samples collected from each boring. The loading docks and associated roll-up doors at each of these buildings are

California Environmental Protection Agency



Recycled Paper

relatively small compared to Building 77. At Building 77, four borings will be completed to cover the larger loading dock area. Sixteen soil samples will be collected at Building 77. In addition, at a small warehouse (Building 51), three borings will be completed with four samples collected from each boring.

One boring is proposed to be drilled in the former burn area, a location that was historically used for igniting off-specification or damaged fireworks products. This area now consists of an enclosed metal cage that rests on the concrete floor of a former building. You are proposing to select the exact location of the boring in the field, in consultation with Board staff. This boring is proposed to be drilled to a maximum depth of 25 feet bgs. Soil samples are proposed to be collected at depths of 1, 5, 15, and 25 feet bgs. Chemical analyses of perchlorate in soil samples collected during the site investigation are proposed to be performed by a California-certified analytical laboratory, using USEPA Method 314.1.

We note that a borehole is not proposed to be drilled in the wood waste pile area, where there is a pit that has been used for disposal of scrap materials for many years during APE – West's operations at the site. According to PES, no sampling is proposed at the wood waste pile area, because the only materials temporarily stored at the wood waste pile area have been wood pallets, other scrap lumber and weeds removed from the property. We understand that your current use of the pit is for wood waste disposal; however, we do not have any records to verify the types of waste that have historically been placed in the waste pit. In fact, during a site visit on November 12, 2002, Board staff observed rusted metal drums in the immediate and adjacent vicinity of the waste pit.

PES anticipates that hollow stem auger or air rotary drilling equipment will be used to advance the soil borings at all of the proposed locations. Based on our recent observation of a trench excavation in the southwestern area of the APE – West site, and our extensive experience in oversight of drilling and well installation at the Mid-Valley Landfill adjacent to the APE – West property, we believe that any attempt to utilize a hollow stem auger to advance soil borings at APE – West will be unsuccessful. Such drilling efforts would be a challenge, given the coarse nature of the subsurface soil (i.e., the presence of small to medium-sized boulders). Therefore, instead of drilling boreholes at the proposed locations, it may be necessary for you to excavate trenches to a total depth of 10 feet bgs, and collect samples of the finer grained materials (such as silt, sand, or clay) that are likely to be interbedded with the coarser sediments.

For the reasons indicated above, we do not concur with your assertion that soil sampling and analyses at the wood waste pit are unnecessary. At a minimum, the wood waste pit should be excavated to at least 20 feet below the existing bottom of the pit. Samples of finer grained soils (such as silt, sand or clay) must be collected and analyzed for the presence of perchlorate (using EPA Method 314.1) and volatile organic compounds (using EPA method 8260). Also, please be aware that the need for additional site investigation of the soil and groundwater will be evaluated once your proposed investigation phase has been completed, and Board staff have reviewed and evaluated the soil sampling results. The final report for this phase of your investigation must be submitted no later than April 14, 2003.

Please notify the following individuals at least 24 hours prior to all field work to allow for inspection and oversight as needed: Kamron Saremi, RWQCB, (909) 782-4303; Wendy Arano,

DTSC, (714) 484-5480; and Peter Murphy, Kennedy/Jenks Consultants - Perchlorate Task Force, (949) 261-1577.

If you have any questions, please contact Kamron Saremi at (909) 782-4303, or you may call Ann Sturdivant, Chief of our Spills, Leaks, Investigations and Cleanups Section, at (909) 782-4904.

Sincerely,

Gerard J. Thibeault
Executive Officer

cc: Jorge Leon, SWRCB, Office of Chief Counsel
Carl Michelsen, PES Environmental, Inc.
Wendy Arano, DTSC, Cypress Office
Daniel Coyle, Downey Brand Seymour & Rohwer, LLP
Inland Empire Perchlorate Regulatory Task Force members (mailing list attached)

KS: Rialto perchlorate/13267/APEworkplanaddendum